

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

IN RE: ASHLEY MADISON CUSTOMER	)	MDL No. 2669
DATA SECURITY BREACH LITIGATION	)	
	)	Case No. 4:15-MD-2669-JAR
	)	
	)	

**DEFENDANT NOEL BIDERMAN’S MOTION TO DISMISS OR STAY  
AND TO COMPEL ARBITRATION**

Defendant Noel Biderman respectfully moves the Court for an order dismissing or staying the claims against him and compelling arbitration of those claims. The grounds for the motion are set out in the accompanying Memorandum of Law in Support of Defendant Noel Biderman's Motion to Dismiss or Stay and to Compel Arbitration, Declaration of Ian M. Dumain, and Declaration of Noel Biderman.

Wherefore, Defendant Noel Biderman respectfully requests that the Court (1) dismiss or stay the claims against him; (2) compel arbitration of those claims; (3) award Biderman his costs; and (4) grant such further relief as the Court deems just.

Dated: August 29, 2016  
Armonk, NY

Respectfully submitted,

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By 

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**CERTIFICATE OF SERVICE**

I certify that on August 29, 2016, I electronically filed Defendant Noel Biderman's Motion to Dismiss or Stay and to Compel Arbitration, the Memorandum of Law in Support of Defendant Noel Biderman's Motion to Dismiss or Stay and to Compel Arbitration, the Declaration of Ian M. Dumain, and the Declaration of Noel Biderman with the Clerk of the Court using the CM/ECF system, which will send notification of the filings to all counsel of record.

A handwritten signature in black ink, appearing to read 'Ian M. Dumain', is written over a horizontal line.

Ian M. Dumain